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6 *Attorneys for Defendant Synchrony Bank*

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 Samantha Barba,
 11 Plaintiff,
 12 v.
 13 Equifax Information Services LLC; Trans
 14 Union LLC; National Consumer Telecom &
 Utilities Exchange, Inc.; Clarity Services, Inc.
 15 and Synchrony Bank,
 16 Defendants.

Case No.: 2:25-cv-00271-ART-DJA

**SYNCHRONY BANK'S UNOPPOSED
 MOTION FOR EXTENSION OF TIME
 TO RESPOND TO COMPLAINT
 (FIRST REQUEST)**

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 18 Defendant Synchrony Bank (“Synchrony”), by counsel and pursuant to Federal Rule of
 19 Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, respectfully requests this Court extend the
 20 deadline in which Synchrony has to answer or otherwise respond to Plaintiff’s Complaint, from
 21 March 6, 2025, to through and until March 20, 2025. In support of this Motion, Synchrony states
 22 as follows:

23 1. This is the first request for an extension of time for Synchrony to respond to
 24 Plaintiff’s Complaint.

25 2. On February 10, 2025, Plaintiff filed a Complaint with this Court [ECF No. 1].

26 3. Plaintiff served Synchrony’s registered agent with the Complaint on February 13,
 27 2025 [ECF No. 5].

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4. Synchrony requests this extension to investigate all relevant matters, ascertain the veracity of the averments in Plaintiff's Complaint, analyze and ascertain any and all affirmative and other defenses, and otherwise submit a proper response to the Complaint.

5. Counsel for Synchrony conferred with Plaintiff's counsel regarding this requested extension, and Plaintiff agrees to this extension.

6. The foregoing Motion is filed in good faith and not for dilatory or other improper purpose.

7. Plaintiff will not suffer any prejudice by the Court permitting Synchrony the requested extension of time and has consented to the requested extension.

8. Granting this Motion is in the interests of justice and is otherwise the right and proper thing to do.

WHEREFORE, Synchrony respectfully requests the Court grant this Motion and extend the time for Synchrony to respond to the Complaint by and through March 20, 2025.

DATED: March 6, 2025.

WOMBLE BOND DICKINSON (US) LLP

/s/ Brittni A. Tanenbaum
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ORDER

IT IS SO ORDERED.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: 3/7/2025

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **SYNCHRONY BANK'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** was filed via electronic filing using the CM/ECF system with the Clerk of the Court on March 6, 2025, which sent e-mail notification of such filing to all CM/ECF participants.

/s/ Lisa M. Noltie
An employee of
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